

May 1, 2006

Dan Opalski, Director
Office of Environmental Cleanup
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, WA 98101-1128

Dear Mr. Opalski:

After reviewing the fact sheet on Terminal 4 Early Action Cleanup, I have a few questions. Why would you need a contingency plan if in fact the CDF (*confined disposal facility*) was constructed to withstand the seismic activity that occurs in the area near the Port of Portland?

According to the *Golder Report*, both the seismic activity and the potential for liquefaction of the alluvial soils beneath the suggested CDF do show potential for failure in the toe area of the berm.

You suggest that a contingency plan would be developed in case of a flood event as well. So, will a contingency plan be needed in both cases? In this case, the *Golder Report* indicates there would be potential for bank erosion because of the sandy materials near the toe of the berm. (Golder, p. 25, 2005)

One of the questions that you ask in your fact sheet is : *Will EPA require sediment from the future Portland Harbor to be placed in the Terminal 4 CDF?* No is the answer given. Then later you state:

"A CDF will create additional disposal options for future decisions for the larger Portland Harbor cleanup. Having a CDF readily available may decrease the cost and increase the speed of future cleanup actions." This seems to be confusing whether the CDF will be used again in the future or not.

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The final question in your fact sheet is also troublesome. ***Is it safe to construct a CDF so close to the residential areas of St. Johns and Linnton?***

The response to this is that: "CDF is much safer than the existing situation where uncontrolled contamination poses a risk of exposure for both people and wildlife." Is there only one method of remediation the contamination at T4?

Clearly you and your colleagues considered the response from the community regarding the CDF installation. Thank you for the close examination of the situation. I will look forward to your answers to my questions.

Sincerely,
Jackie L. Calder
Board Member

Portland Harbor Community Advisory Board